

### **REMARKS/ARGUMENTS**

Claims 1~12 are withdrawn into a division in Applicant's earlier response for a restriction requirement.

Claim 13 is amended by emphasizing that the permanent metal substrate can be plated only after completing the electrodes which are generally formed through an annealing process.

The Examiner's rejections to claim 13 have been carefully reviewed, in which Ishikawa et al. teach a plane LED structure and Chen et al. teach a method for plating a copper substrate beneath a mirror.

The Applicant understands that Ishikawa et al.'s plane LED structure without any plated metal substrate is known by one skilled in this art. The Applicant also understands that Chen et al. teach plating the metal layer (70) either directly on the ohmic electrode (68), or on a mirror which is deposited on the ohmic electrode (68). In other words, Chen et al. never teach plating a metal substrate beneath a mirror which is deposited beneath an epitaxial layer as the Applicant's.

Moreover, Ishikawa et al.'s GaAs substrate (301) is remained in the LED structure, and Chen et al.'s temporary substrate (60) is removed after the metal substrate (70) is plated on the opposite side. In the Applicant's process and structure, the metal substrate is plated on the mirror which is exposed by removing the temporary substrate, i.e., the plated substrate basically replaces the temporary substrate and thus is formed on the same side.

Accordingly, the Applicant takes a position that a lot in the present invention are never taught by Ishikawa et al. and Chen et al., and the present invention couldn't be achieved by simply combining Ishikawa et al. and Chen et al.'s structures.

The Applicant also believes that Chen et al.'s process is unfeasible and thus the LED fabricated by employing this process could not exist since the plated metal

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substrate (70) and semiconductor layers (62, 64 and 66) will be destroyed or cracked during the annealing process for forming the bonding pad (78).

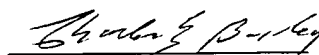
To exclude the case in Chen's disclosure, the Applicant's permanent metal substrate is further defined to be plated after completing the electrodes.

Claims 14~15, 18~25 are remained original as the Applicant believes that the amended claim 13 may overcome the Examiner's rejection. Further, the epitaxial layers and mirrors mentioned in claims 21~23 are not key features as well as the plated substrate formed beneath a plane LED. Therefore, the Applicant thinks that it's suitable for claiming material of the epitaxial layers and the respective mirrors. However, if the Examiner suggests to cancel claims 21~23, the Applicant will do.

Claims 16&17 were canceled in an earlier amendment.

The Applicant also believes that the amendments and remarks/arguments are a complete response to the Examiner's rejections, and thus respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,



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